

REMARKS

Reconsideration and further examination of the subject patent application in light of the present Amendment and Remarks is respectfully requested.

Claims 1-3 and 5-27 are currently pending in the application. Claims 1-3 and 5-27 stand rejected.

Rejections Under 35 U.S.C. §102

Claims 1-3 and 5-27 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Pat. No. 6,324,681 to Sebesta et al. Applicant respectfully traverses this rejection.

In response, independent claim 1 has been further limited to “creating at least one executable function which creates a data structure that receives events coming from the event source and that triggers business rule responses to the events; and creating a workflow to be executed on the workflow server engine as a portion of a business rule response, said workflow triggered by the executable function in response to receipt of an event from the event source.” Independent claims 14, 20 and 26 have been similarly limited. Support for an executable function or data link library that receives events from an event source and that triggers a business rule response is provided within the Specification on page 7, lines 14-16 and within the paragraph starting on page 18, line 16 and continuing to page 19, line 7.

As now structured, the claims are now limited to events with business rule solutions. In contrast, Sebesta et al. is directed to computer events whose only goal is to access a service on an enterprise server.

In general, the workflows of Sebesta et al. are directed to the technical details of computer interfaces. The business problems described in the Specification could not be solved by the system described in Sebesta et al.

For example, an event in Sebesta et al. would be an access request by a user. The step of defining a user would involve identifying the user. In contrast, an event under the claimed invention may be an e-mail arriving at an e-mail server or a telephone call arriving at an automatic call distributor. In this case, defining the event would involve defining the type of event rather than identifying the user.

Similarly, an executable function or data link library that triggers workflows is programmed to select a workflow based upon the type of event rather than upon the identity of the user. As an example, a telephone call would require an entirely different executable function or data link library than an e-mail.

In addition, the Specification explicitly states that “workflow’ is intended to designate a form of business rule processing.” Business rule processing by its very nature is a much broader concept than the provision or use of a computer gateway as under Sebesta et al.

For example, the claimed invention is described in the context of “transaction routing include telephone call routing, e-mail routing, and Web request routing from an event source to a software or human agent” (Specification, page 9, lines 13-15). In this context, “Depending upon the business rules, the response may include various steps including routing a query to one of the agent desktop clients 128, automatically responding to the event, etc. . . . The workflow-driven business rules 114 may be a simple process or maybe a complex process with multiple steps and the exchange of

information between the workflow server engine 110 and the event source” (Specification, page 9, lines 2-7).

The Sebesta et al. gateway is set in the context of a single event (i.e., a user requests and receives access to a service on an enterprise server). In contrast, “Workflows are typically associated with one or more events from a given event source, thereby allowing a workflow designer the choice of using event parameters in the business logic” (Specification, paragraph beginning on line 22 of page 7 and continuing to line 2 of page 8).

Further, even in very simple cases (e.g., an agent accessing a database) the novel use of the executable function that triggers workflows provides benefits that are not available under Sebesta et al. For example, a “benefit the present invention provides is an improved handling of exceptions” (Specification, page 40, lines 11-12). In this regard “Following are examples of exceptions that can be handled: database access failures, failure to connect to other services, invalid expressions, etc.” (Specification, page 41, lines 3-6). Page 41 of the Specification provides examples of workflow steps that can be implemented in the case of database exceptions. Again, “The workflow-driven business rules 114 may be a simple process or may be a complex process with multiple steps and the exchange of information between the workflow server engine 110 and the event source” (Specification, page 9, lines 4-7).

In general, Sebesta et al. does not have the flexibility or utility of the claimed invention because Sebesta et al. does not define events in the same way or provide “at least one executable function which creates a data structure that receives events coming from the event source and that triggers business rule responses to the events.”

Since Sebesta et al. does not have this capability, Sebesta et al. does not do the same or any similar thing as that of the claimed invention. Since Sebesta et al. does not do the same or any similar thing as that of the claimed invention, the rejections are now improper and should be withdrawn.

Closing Remarks

For the foregoing reasons, applicant submits that the subject application is in condition for allowance and earnestly solicits an early Notice of Allowance. Should the Primary Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, the Primary Examiner is respectfully requested to call the undersigned at the below-listed number.

The Commissioner is hereby authorized to charge any additional fee which may be required for this application under 37 C.F.R. §§ 1.16-1.18, including but not limited to the issue fee, or credit any overpayment, to Deposit Account No. 23-0920. Should no proper amount be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal, or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 23-0920. A duplicate copy of this sheet(s) is enclosed.

Respectfully submitted,
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By


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